UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

KLON LLC and WILLIAM FINNEGAN)))
Plaintiffs,)) C.A. No. 1:25-CV-11580-NMG
v.) C.A. NO. 1.23-C V-11360-NWIG
EMPOWER TRIBE HQ FZE,))
EMPOWER TRIBE COMMERCIAL FZE,)
MUSIC TRIBE BRANDS DK A/S,	
EMPOWER TRIBE INNOVATIONS UK LTD.,	
EMPOWER TRIBE INNOVATIONS US INC., and)
JOHN DOES 1-10,)
)
Defendants.)
)

NOTICE OF DISMISSAL

Pursuant to Fed. R. Civ. P. 41(a)(1)(A), Plaintiffs Klon LLC ("Klon") and William Finnegan ("Finnegan") hereby dismiss the above-captioned matter with prejudice, and without costs to any party.

Dated: September 29, 2025 KLON LLC and WILLIAM FINNEGAN

By: /s/ Keith Toms
Keith Toms
Anne E. Shannon
McCarter & English LLP
265 Franklin Street
Boston, MA 02110
(617) 449-6500
ktoms@mccarter.com
ashannon@mccarter.com

Matthew S. Borick William J. Morris III Downs Rachlin Martin PLLC 199 Main Street, P.O. Box 190 Burlington, VT 05401-0190 (802) 863-2375 mborick@drm.com wmorris@drm.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/Keith Toms
Keith Toms

25186800.1